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From: drupal_admin@epa.gov [mailto:drupal_admin@epa.gov]
Sent: Tuesday, September 06, 2016 12:27 PM
To: HarborComments <HarborComments@epa.gov>
Subject: Harbor Comments

Submitted on 09/06/2016 3:27PM
Submitted values are:

Your Name: (b) (6)
Your Email: (b) (6)
Your Comments:
I am writing to express my personal support for Alternative G as the best feasible option for the Willamette Harbor cleanup. I also request additional comment time, in order to allow comment from my official position as executive director Columbia Slough Watershed Council. As a council we did not have sufficient time to review the proposal and vet it with board members.

At this juncture, I also support further recommendations outline by Willamette Riverkeepers:

-Adopt Alternative G with enhancements to improve the long-term effectiveness of the cleanup.
-Select disposal options that do not include a Confined Disposal Facility and that do include treatment of dredged sediment to breakdown or bind contaminants.
-Because Institutional Controls (IC) are not effective, especially in the long term, EPA needs to reduce the need for ICs, and include in the ROD provisions for PRPs covering the costs of ICs, and provisions for evaluating the IC effectiveness with regular program modifications.
-Monitored Natural Recovery (MNR), with or without enhancement has not been shown to be effective and therefore EPA needs to reduce the use of MNR, enhance the monitoring to annually, and include provisions in the R.O.D. for contingency actions if monitoring data indicate unsatisfactory performance results.
-Accept the new technology options that will reduce costs and improve long term effectiveness. These may be conducted as pilot projects.
-Include atmospheric transport in analysis of exposures. This inclusion will indicate the extent to which remaining contamination will expose humans in the community to unacceptable risks.
-Require the state of Oregon to continue upland sources control via legally enforceable means; the current text indicates that this approach “May” be taken.
-EPA needs to require installation of environmental and quality of life monitoring during the construction phase, with the PRP’s covering the cost.
This provision needs to be a required element and clearly stated.
-The Community needs regular opportunities for input during the construction phase of the cleanup.
-The general goals and design characteristics/requirements of the fish tissue monitoring need to be specifically listed in the R.O.D.

-Habitat restoration following remedy construction needs to be a required element in the R.O.D. Aquatic habitat that is disturbed by the remedy must be restored and the full cost paid by the PRPs. When nearshore and intertidal habitat has to be removed, it must be replaced and replanted with SAV that thrives.
-This remedy will have features that must be maintained in perpetuity and thus analyses need to account for a longer time frame in estimating costs and benefits.
-The community expects the final remedy to comply with state environmental quality, especially the water quality criteria for the PTW contaminants.
PCBs, dioxins and DDTs in water and fish must meet state water quality standards.
-When the data are obtained for the remedial design, these must be shared with the community.
-This site presents characteristics of an Environmental Justice community, yet EPA has not addressed this issue. EPA needs to assess the EJ aspects of this site and take appropriate action to enhance protective and remedial measures.
-The final result of the cleanup should be the lifting of the Fish Consumption Advisory related to PCBs for the Portland Harbor area by a specific date.
-The US EPA should lead the cleanup effort after the ROD, not the State of Oregon.
-Sediment should be removed from the Swan Island area rather than implementing a massive input of carbon as a treatment.

Sincerely, (b) (6) (Resident of Portsmouth neighborhood, Portland OR)